

CHRISTOPHER S. PORRINO  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for State Defendant(s)  
R. J. Hughes Justice Complex  
25 Market Street, P.O. Box 112  
Trenton, New Jersey 08625

By: Kathryn Duran  
Deputy Attorney General  
(609) 777-4861  
[Kathryn.Duran@dol.lps.state.nj.us](mailto:Kathryn.Duran@dol.lps.state.nj.us)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY, CAMDEN VICINAGE

ROCCO CREEL, THOMAS HAMILL,	:	
ADVOCATES FOR DISABLED	:	UNITED STATES DISTRICT COURT
AMERICANS,	:	DISTRICT OF NEW JERSEY
	:	CAMDEN VICINAGE
Plaintiff(s)	:	
	:	Docket No. 1:16-cv-02883-JBS-AMD
v.	:	
	:	
ROWAN UNIVERSITY, and ALI A.	:	<u>CIVIL ACTION</u>
HOUSHMAND,	:	
	:	<b>NOTICE OF MOTION TO DISMISS</b>
Defendant(s)	:	<b>THE COMPLAINT PURSUANT TO</b>
	:	<b>FED.R.CIV.P. 12(b)(1) and 12(b)(6)</b>

To: WILLIAM T. WALSH, CLERK  
U.S. District Court, Camden Vicinage  
Mitchell H. Cohen Bldg. & U.S. Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, New Jersey 08101

ANTHONY J. BRADY, ESQ.  
1 Rose Avenue, P.O. Box 19  
Maple Shade, New Jersey 08052

PLEASE TAKE NOTICE that on October 17, 2016, the  
undersigned, Christopher S. Porrino, Attorney General of New

Jersey, by Kathryn E. Duran, Deputy Attorney General, as counsel for Defendants, Rowan University and Ali A. Houshmand, shall move before the Honorable Jerome B. Simadle, U.S.D.J., for entry of an Order to Dismiss the Complaint Pursuant to FED.R.CIV.P. 12(b)(1) and 12(b)(6).

PLEASE TAKE NOTICE that the undersigned will rely on the attached brief in support of the motion.

A proposed form of Order is attached hereto.

Respectfully submitted,

CHRISTOPHER S. PORRIO  
ATTORNEY GENERAL OF NEW JERSEY

By: s/Kathryn E. Duran  
Kathryn E. Duran  
Deputy Attorney General